

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of:	§	
Grunow, David W. et al	§	
Serial No. 10/652,359	§	Confirmation No.: 1316
Filed: August 29, 2003	§	Group Art Unit: 2835
For: METHOD TO ALLOW VERTICAL	§	Examiner: Pape, Zachary
DOCKING TO A MEDIA STATION	§	

Mail Stop AF  
Commissioner for Patents  
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**PRE-APPEAL BRIEF REQUEST FOR REVIEW**

Responsive to the Office Action dated June 20, 2006, please consider the following remarks in connection with the pre-appeal request for review. Review of the final rejection is requested for the following reasons.

The rejection of claims 1-21 is not supported by a *prima facie* case of obviousness for claims 1-21.

Claims 1-21 are rejected under 35 U.S.C. 103(a) as being unpatentable over Won et al (US 6,744,627) (hereinafter Won). A *prima facie* case of obviousness is missing, however, at least because there is no support for an obviousness rejection of the claimed subject matter as a whole, because Won fails to disclose each element of the claim or suggest missing elements.

Independent claim 10 includes: a pair each of moveable rear latches and moveable front latches, wherein the pair of moveable rear latches and the moveable front latches are operable to resiliently spread apart in opposite directions to latch on to corresponding matching slots of the portable device in response to an application of a substantially vertical force on the portable device for docking whereby the docking device and portable device are secured; a pair of alignment pins, wherein the pair of alignment pins are operable to mate with corresponding

notches on the portable device when the portable device is docked; and a plurality of side sections on the docking device, at least one of the side sections including an alignment fin.

Secure latching, alignment and vertical "top down" latching are all important features for improved docking of a portable device and a docking station.

Toe-in docking as taught by Won (see also Fig. 1, Prior Art of the present invention) includes inserting the front edge of the computer main body 11 against a raised lip (not numbered) on the docking station 21. The rear of the main body 11 is lowered until hook grooves 17 and hooks 67 engage (Fig. 1). The main teaching of Won concentrates on the lock device 83 rather than the latching of grooves 17 and 67. Also, Won does not teach the vertical "top down" multiple latching of the invention.

In the invention, Fig 2A-2D, top down latching includes a plurality of identical latches 120, alignment members 250 and supplemental alignment members 270. A portable PC 101 is moved vertically downwardly onto docking device 210 and alignment members 250, 270 along with latches 120 are engaged. The latches 120, both front and rear, are operably resiliently spread apart in opposite directions to latch with the PC 101 in response to a vertical force. The alignment members 250, 270 assist in proper docking.

The USPTO argues that Won renders the invention obvious. Won however fails to teach or suggest the claimed invention.

Here, Won does not teach, or even suggest, applying a substantially vertical force on the portable device to cause the docking, wherein the pair of moveable rear latches and the moveable front latches are operable to resiliently spread apart in opposite directions to movably latch on to corresponding matching slots of the portable device when docked, whereby the docking device and portable device are secured.

Won, as the USPTO notes, fails to teach movable front latches and movable rear latches operable to spread apart in opposite directions.

In fact, Won requires movement of a lock device with a key to secure the computer main body and the docking station.

The USPTO argues that it would be obvious to duplicate the number of rear latches of Won to include front latches. The USPTO further argues that it would also be obvious to provide the front and rear latches to move apart in opposite directions. However, Won does not suggest this. Furthermore, Won requires a key lock to secure the computer to the docking station. In fact, the USPTO acknowledges that 4 latches is an improvement over the 2 latches of Won to "prevent accidental disconnection between each device." This fortifies the applicants' position that the claimed invention is not obvious over Won.

The invention provides a method and apparatus for secure vertical docking.

Other reasons for the patentability of claims 1-21 have been previously presented and will be maintained should the filing of an appeal become necessary.

Respectfully submitted,



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Dated: 8-11-06  
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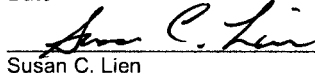
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Susan C. Lien

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<b>PRE-APPEAL BRIEF REQUEST FOR REVIEW</b>		Docket Number (Optional) <b>16356.821 (DC-05237)</b>	
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		First Named Inventor <b>Grunow, David W. et al</b>	
		Art Unit <b>2835</b>	Examiner <b>Pape, Zachary</b>
<p>Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.</p> <p>This request is being filed with a notice of appeal.</p> <p>The review is requested for the reason(s) stated on the attached sheet(s). Note: No more than five (5) pages may be provided.</p> <div style="display: flex; justify-content: space-between; align-items: flex-start; margin-top: 20px;"><div style="width: 45%;"><p>I am the</p><p><input type="checkbox"/> applicant/inventor.</p><p><input type="checkbox"/> assignee of record of the entire interest. See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed. (Form PTO/SB/96)</p><p><input checked="" type="checkbox"/> attorney or agent of record. Registration number <u>26,528</u></p><p><input type="checkbox"/> attorney or agent acting under 37 CFR 1.34. Registration number if acting under 37 CFR 1.34 _____</p></div><div style="width: 50%; text-align: center;"><div style="margin-bottom: 10px;"> _____ Signature <b>James R. Bell</b> _____ Typed or printed name</div><div style="margin-bottom: 10px;"><b>512-867-8407</b> _____ Telephone number</div><div><b>8-11-06</b> _____ Date</div></div></div> <p>NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required. Submit multiple forms if more than one signature is required, see below*.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"><p><input checked="" type="checkbox"/> *Total of <u>one</u> forms are submitted.</p></div>			

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